

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

UNITED STATES OF AMERICA,)
)
Plaintiff,)
)
v.) No. 4:23-cr-00578-AGF
)
)
CONNIE BOBO,)
)
Defendant.)

GOVERNMENT'S MOTION FOR FRYE HEARING

COMES NOW the United States of America, by and through Thomas C. Albus, United States Attorney, and Derek J. Wiseman, Assistant United States Attorney, for the Eastern District of Missouri, and hereby moves for a hearing under *Missouri v. Frye*, 566 U.S. 134 (2012). In support, the Government states as follows:

1. On October 2, 2023, the defendant was charged by Indictment with 3 counts of wire fraud in violation of 18 U.S.C. § 1343; three counts of aggravated identity theft in violation of 18 U.S.C. § 1028A; and, two counts of obstruction of an official proceeding in violation of 18 U.S.C. § 1512(c)(2). Doc. 1.
2. On October 3, 2024, Defendant retained new private counsel. Defendant's initial counsel filed a motion to withdraw on October 28, 2024. Docs. 67, 70.
3. The Government provided a proposed plea agreement to the defendant's counsel on April 10, 2025, with an expiration date of August 20, 2025.
4. To date, the Government has not received a response from the defendant regarding the proposed plea agreement.
5. Trial in this case is set for October 20, 2025, at 9:30 a.m. Doc. 92.

6. The Government therefore requests a *Frye* hearing to ensure that the defendant has a sufficient understanding of the terms of the proposed plea agreement. The Government further believes that a *Frye* hearing could prevent an unnecessary delay of the trial that could potentially result from the defendant later claiming that he did not fully understand the terms of the proposed plea agreement (or the corresponding risks of proceeding with trial).

For these reasons, the Government respectfully requests that the Court hold a hearing pursuant to *Missouri v. Frye*, 566 U.S. 134 (2012).

Respectfully submitted,

THOMAS C. ALBUS
United States Attorney

/s/ Derek J. Wiseman
DEREK J. WISEMAN, #67257MO
Assistant United States Attorney

Dated this 18th day of August, 2025.

CERTIFICATE OF SERVICE

I hereby certify that on August 18, 2025, the foregoing was filed electronically with the Clerk of the Court to be served by operation of the Court's electronic filing system upon the defendant.

/s/ Derek J. Wiseman
DEREK J. WISEMAN, #67257MO
Assistant United States Attorney